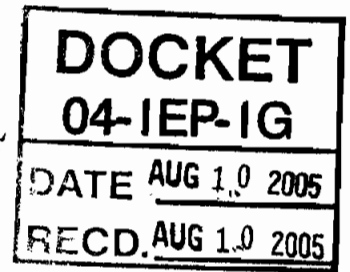




SAN FRANCISCO BAY AREA OFFICE

Protecting endangered species and wild places through science, policy, education, and environmental law



August 10, 2005

California Energy Commission Dockets Unit
Attn: Docket No. 04-IEP-1G
1516 Ninth Street MS-4
Sacramento, CA 95814-5512

I am writing on behalf of the Center for Biological Diversity (CBD) in response to comments on the 2005 Integrated Energy Policy Report, with respect to "Assessment of Avian Mortality from Collisions and Electrocutions," CEC-700-2005-015, by Melinda Dorn.

The CBD has been involved for the past two years in attempts to reduce the massive bird kills at the Altamont Pass Wind Resource Area. The research and mitigation and policy recommendations provided by the CEC have been essential to understanding the scope and nature of the bird kill problem and crafting workable mitigation measures to effectively address the problem.

Wind power companies and electrical facility owners are now attempting to discredit scientific research conducted by the CEC, specifically the June 2005 report, "Assessment of Avian Mortality from Collisions and Electrocutions." On the contrary, the scientific findings in this report and the policy recommendations that follow from them should be published and implemented.

The CEC's research has been crucial to identifying the scope of the avian mortality problem caused by wind turbines at Altamont Pass and elsewhere. The CEC has funded research that the industry refused to fund, despite the knowledge it was causing massive raptor mortality at Altamont Pass with no effective mitigation plan for reducing that mortality.

The CEC needs to stay involved in this type of research in the future, not just at Altamont but throughout California as wind power projects are proposed throughout the state. The CEC needs to continue research to identify effective mitigation for the next generations of turbines and proposed new wind power sites.

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CEC staff and contractors have done a superlative job in conducting objective scientific research and providing critical information for resource and permitting agencies, including the CA Attorney General, CA Dept. of Fish and Game, U. S. Fish and Wildlife, and Alameda County. CEC staff and contractors should be commended, not attacked for their work.

The CEC has effectively communicated with all stakeholders throughout their research. For their watershed August 2004 report on Altamont Pass, CEC contractors met repeatedly with the wind industry and their consultants throughout their research period. They shared their preliminary results with industry in the year before publication of the report, gave drafts to industry to review before publication, and incorporated all industry comments. During their participation in the Altamont Pass windpower workgroup, the CEC has gone out of their way to make their research available to all parties and to quickly and accurately respond to industry comments and questions.

Sincerely,

Jeff Miller
Bay Area Wildlands Coordinator